



PALMDALE WATER DISTRICT

2029 East Avenue Q • Palmdale, California 93550 • Telephone (661) 947-4111
Fax (661) 947-8604
www.palmdalewater.org

LAGERLOF, SENEAL, BRADLEY, GOSNEY & KRAUSE LLP
Attorneys



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August 19, 1999

State Water Resources Control Board
ATTN: Mr. Todd Thompson,
Associate Water Resources Control Engineer
901 P Street
P. O. Box 944213
Sacramento, CA 94244-2130

**RE: COMMENTS ON DRAFT E.I.R. COVERING GENERAL WASTE
DISCHARGE REQUIREMENTS FOR BIOSOLIDS LAND
APPLICATION DATED JUNE 28, 1999**

Dear Mr. Thompson:

The District's review of the subject draft E.I.R. found that many concerns raised in our November 30, 1998 letter were either not addressed or not included in the proposed General Order (GO). However, some concerns are reflected in the proposed project and the Modified GO Alternative.

Major concerns that remain to be addressed are:

- 1) It is not clear what the application and annual fees will be. The fees must be sufficient to fund the administration and monitoring of land application operations by the Regional Boards. This should include a site inspection prior to issuance of a Notice of Applicability. 7-1
- 2) The draft requirements do not include criteria or methods of establishing the agronomic rate or nitrogen carry-over. These are needed to accurately apply biosolids. This must be provided in the final requirements to make them universal and enforceable. 7-2

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- 3) Record searches and field inspections should be required to locate all active, inactive, and abandoned wells at the proposed land application site and adjacent properties. 7-3

The District would like to see these three items included in the GO or the Modified GO Alternative. A grave concern is the statement made on Page ES-16 acknowledging the lack of staffing and funds to adequately monitor and enforce biosolids regulations. State level administrative or legislative changes are needed to ensure any regulatory program fulfills its intent. 7-4

The District also supports adopting the Modified GO Alternative, including the above listed changes. As stated, it is the environmentally superior alternative and is a reasonable approach if it is enforced. 7-5

Please let me know if you have any questions.

Very truly yours,

DENNIS D. LaMOREAUX,
General Manager

DDL/dtd

cc: Board of Directors

Responses to Comments from Palmdale Water District

- 7-1. A site inspection prior to issuing any waste discharge requirement is advisable and should be paid for by the discharger. The fee system is intended to cover even individually issued waste discharge requirements, including pre-inspections. Pursuing general waste discharge requirements is a more streamlined process and therefore is more cost effective. Also see Master Response 1.
- 7-2. Comment noted. For the agronomic rate calculation to be determined correctly, the soil carry-over of nitrogen must be included. As pointed out, the Monitoring and Reporting Program in the proposed GO did not have a location to report this information. But the draft text of the GO in Appendix A's Monitoring and Reporting Program now includes reporting locations for residual soil nitrogen in both the Pre-Application Report and the Annual Report.
- 7-3. The Notice of Intent and the Pre-Application Report require that wells be identified on a USGS 7.5 Minute map or similar map. The extent of the search on the part of the landowner and generator, who are the principal entities responsible for compliance, has not been specified. However, the discharger is also required to notify local water districts, and the county health and planning departments. Such notifications may also assist in identifying such wells.
- 7-4. Comment noted and discussed in responses to comments 7-1, 7-2 and 7-3, and Master Response 1.
- 7-5. The commenter identifies the Modified GO Alternative, with the revisions recommended in comments 7-1 through 7-4, as the district's preferred alternative.